



IN REPLY REFER TO:

# United States Department of the Interior

## NATIONAL PARK SERVICE

Big Bend National Park  
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JL7615 (7130)

March 25, 2006

### **Memorandum**

To: Superintendent, Big Bend National Park

From: Management Assistant, Big Bend National Park

Subject: Mountain Bike EA Internal Scoping Meetings

### **Issue**

Big Bend National Park is examining the possibility of expanding mountain biking opportunities in the park.

### **Background**

In May of 2005 the International Mountain Bicycling Association (IMBA) signed a General Agreement with the National Park Service (NPS) with the goal of “providing high quality mountain biking opportunities for visitors to enjoy the national park system in appropriate areas in a manner consistent with our stewardship responsibilities.”

In October of 2005 a local group, the Big Bend Trails Alliance (BBTA), approached the park and asked if we would be interested in being one of the parks selected for one of the pilot projects under the agreement with IMBA. We indicated that we were open to the possibility but that we had no funds available for the National Environmental Policy Act (NEPA) compliance process and that we were not going to re-set any previous funding priorities to work on a mountain biking Environmental Assessment (EA). BBTA then asked if we would consider doing the required EA if they, and others, were able to come up with the funding to contract out the EA to a private firm and ask for an estimate of that amount. We said if they were able to raise the estimated \$25,000 required for an EA we would proceed with the examination of possibly expanding mountain biking opportunities in the park.

A number of groups including Bikes Belong, IMBA, BBTA and the Intermountain Region (IMR) of the NPS were able to come up with the required funding and we agreed to proceed with the project.

As part of the NEPA process, public scoping meetings were held in Alpine, Texas on January 30<sup>th</sup>, 2006 and in Study Butte, Texas on January 31<sup>st</sup>, 2006. Approximately 20-25 people attended each of these meetings.

The NEPA process also requires that internal scoping meetings be held with agency employees. Internal scoping sessions were held in the park on February 14<sup>th</sup>, 16<sup>th</sup> and 24<sup>th</sup>. Approximately 15-20 people attended one of these meetings.

This memo captures the questions, thoughts and concerns expressed by NPS employees and volunteers during those internal scoping sessions.

### **NPS Internal Scoping Sessions**

The feelings of the park staff can be broken down into two main categories; practical and philosophical.

#### ***Practical Concerns***

- The park budget is already stretched to the limit and will probably get worse, not better, as the recent Core Operations exercise and memos from our regional and national offices have indicated.
- There would be lots of additional costs other than simply those associated with building and maintaining any new trails. Parking and access among others.
- Maintenance, interpretation and protection work and caseloads would all be increased, and incur additional costs.
- We have trouble maintaining the hiking trails we have now with a trail crew that isn't base funded and competes for limited funding on an annual basis.
- In light of the budget and staffing issues we already face, is this additional work something we want to, or can, take on?
- There has already been a noticeable increase in illegal riding in the park and we haven't been able to control that.
- Many staff members are quite skeptical about the mountain biking community's offer to both help build and maintain any new mountain biking trails. What about the long-term?
- Despite mountain bike advocates being able to raise the necessary funds for the EA, this project will take valuable time and effort away from previous staff commitments. That costs money.
- Why should this proposal supersede new trail priorities already established under the recently completed General Management Plan and the Backcountry Management Plan?
- What will these proposed trails look like? There seems to be some confusion about how wide and what their impacts will be in terms of erosion, scarring and visibility.
- While any new trail would be multiple use, is this genuine or simply PC talk to get access?
- How did this go from possibly "expanding opportunities" to immediately focusing on building new single-track trails?
- The backcountry areas being considered inside the park are inferior routes compared to existing and potential routes outside the park, which are high quality experiences.
- We could end up with a bike trail that isn't very desirable. Is this initiative more a symbolic victory for IMBA and other proponents rather than a functional high quality mountain biking outcome?
- There are already good single-track riding options right outside the park. Seems like it would make more sense to expand those.
- If the purpose is to increase visitation and economic potential in the park and area, then increased mountain biking opportunities outside the park will achieve those goals.

- This seems more appropriate for the use of private land outside the park. They are looking for more economic development opportunities, here's one where the economic benefits would flow directly to them.
- IMBA could better use their money to expand opportunities on private land.
- Park could help inform visitors of the opportunities outside the park.
- Would commercial mountain biking be allowed. If so, how is that managed?
- In addition to the increased maintenance workload that would be associated with this, what about the increase to the protection rangers?
- Search and Rescue (SAR) concerns. Access would be difficult.
- Possibility of much more serious injuries than with hikers.
- Possibility of multiple serious injuries occurring simultaneously.
- While SAR can be optional under certain circumstances, we are required to respond to Emergency Medical Services (EMS) situations, it is never optional.
- How would the trails be patrolled?
- Would patrol, EMS/SAR incidents and maintenance require additional specialized equipment?
- Old Ore Road is already a good ride, building an additional trail that parallels it isn't needed.
- Would adding trails to existing road corridors expand those corridors incrementally and possibly nibble away at wilderness boundaries?
- While nearly all existing park trails (other than the trailheads) are in areas managed as wilderness and therefore not going to be examined, Hot Springs Trail from RGV is not. Would it be examined as a possible mountain biking opportunity?
- How can we propose such an activity given our Backcountry Management Plan zoning prescriptions? These areas are in the "Wild" zones established under that plan. It commits us to preserving the undeveloped and trail-less nature of all backcountry areas not currently containing trails. This is a separate designation from the Wilderness Management Zone.
- Lack of specificity on the Organic Act resulted in a broad mix of values and experiences in the various NPS units across the country. The General Authorities Act of 1979 mandated servicewide consistencies resulting in "a single expression of a cumulative national heritage." The Code of Federal Regulations implements this mandate including the rule of no bicycling off-road in NPS units. Let's not set a precedent of picking apart and compromising this consistency by changing the rules for each activity and park.

***Philosophical Concerns – Most of the comments and concerns expressed by park staff were articulated by more than one person. The same concerns emerged repeatedly and crossed divisional lines.***

- Many people had serious concerns about the implications of the "pay for play" aspects of having the groups that support the activity fund the EA. Will this set a pattern not only for this park, but others? That we will only consider activities where the proponents raise the funding necessary for the compliance study? Will the NPS lose control over these types of management decisions and be directed to examine certain activities to the exclusion of others?
- Many people also had serious concerns about the implications of this project for other NPS areas, especially if the expansion of mountain biking opportunities in the park is approved and we build a single-track trail for mountain bikers in a natural, wilderness dominated park. While the activity *may* be appropriate for the urban parks like Rock Creek and Cuyahoga Valley, it is not for parks like Big Bend.

- Very serious concerns about this activity as a fairly benign way of possibly opening up both undeveloped backcountry areas and wilderness in all parks to new inappropriate activities. There is a lot of suspicion about this. Seen as a “slippery slope” for such activities as ORVs, dirt bikes, Segway scooters, jet skies, etc. and other currently non-permitted activities.
- If a change of the existing Code of Federal Regulations through the rulemaking process can make this currently illegal activity legal, then the same could occur for other activities and technologies.
- New activities and technologies are constantly emerging and there were many questions about whether we should be examining them individually as they emerge, or simply continue to manage for the overall preservation and protection of NPS lands as we always have.
- IMBA has openly advocated opening up wilderness to mountain biking. While that isn’t part of the project here, it is part of their national agenda.
- A lot of discussion and concern about the extremely tenuous nature of the current NPS policy that requires the agency to manage both proposed and suitable wilderness as designated wilderness. What’s to stop the current or subsequent administration(s) from simply overturning the policy with the stroke of a pen?
- Would allowing this activity in areas currently designated as non-wilderness (Grapevine Hills area) preclude designating those areas, or any other similar areas, as wilderness forever? Seen as an agency wide concern.
- Discussion about the NPS’s original opposition to the implementation of the Wilderness Act in NPS units. The opposition was based on the NPS belief that it wasn’t necessary because the NPS mission was already to keep the backcountry wild and not intrude on those areas with machines, mechanized transport, etc. If implemented the project would demonstrate NPS inability to preserve primitive and wild conditions in non-wilderness backcountry.
- IMBA, as an advocacy organization, raises both their national profile and money by their participation in this project. Their motives were questioned.
- Many comments about the appropriateness of examining one particular activity for expansion when it is already allowed and there are numerous opportunities for single-track riding right outside the park.
- Many comments about the appropriateness of examining one particular activity, period.
- Too much accommodation for one proposed activity.
- Suspicion of whether or not any new single-track trail would truly be a multi-use trail, if built, or if that is merely PC talk designed to help move the process along.
- Many questions about whether or not this specific activity is a good enough reason to pursue a rulemaking change, which is a very serious proposal.
- Is expanding this activity something an agency with a very clear preservation mandate should even be considering, especially since it is readily available on other multi-use public USFS and BLM land? NPS roads are enough.

## **Conclusions**

There is very little support among park staff for expanding mountain biking opportunities in Big Bend National Park. There was none expressed at any of the internal scoping meetings.

For both practical and philosophical reasons they do not feel this is a good idea. Our budget and staff are already stretched to the limit, the activity is already allowed in the park and good single-track riding is available right outside the park.

They are not against the activity itself, many park staff members are avid riders. But they do not feel it is appropriate to expand the activity in Big Bend.

There is also a great deal of worry, suspicion and outright skepticism about this proposal. While it is recognized that it does not set an outright precedent for other NPS areas if approved, it does make it much easier to propose in other NPS areas and more difficult to simply deny the request. The “slippery slope” reference came up repeatedly in terms of the possibility and appropriateness of changing longstanding NPS policies with regard to wilderness use/management, motorized recreation, definitions of a “mechanized” device, agency control over examined activities, “pay for play” implications, rulemaking and a host of other serious concerns. The current policies are strongly supported by all levels of the park staff and they see no good reason to change them simply to allow for expanding mountain biking opportunities in the park.

In a word, the park staff’s answer to the possibility of expanding mountain biking opportunities in Big Bend National Park is a resounding “No”.